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Brett Schoel

From: Brett Schoel
Sent: Friday, April 21, 2017 12:22 PM
To: 'Douglas C Fladseth'
Cc: Lynetta Goodwin; 'Rebecca Heath'; 'Kelly Mortensen'
Subject: RE: Cynthia Gutierrez v. SRMH...

Do I WANT to draft it? No. But, I will try to put together a draft.

From: Douglas C Fladseth [mailto:fladseth@aol.com]
Sent: Friday, April 21, 2017 12:13 PM
To: Brett Schoel <bschoel@ljdfa.com>; 'Douglas C Fladseth' <fladseth@aol.com>
Cc: Lynetta Goodwin <lgoodwin@ljdfa.com>; 'Rebecca Heath' <rebecca@medicalmalpracticegroup.com>; 'Kelly Mortensen' <dcfsecretary1@gmail.com>
Subject: RE: Cynthia Gutierrez v. SRMH...

Brett thanks re the films.

Do you want to draft the motion to continue the discovery cutoff and explain we are bringing in the ER defendants and I will sign off on it with you for the Court to consider ?

Thanks, Doug.

From: Brett Schoel [mailto:bschoel@ljdfa.com]
Sent: Friday, April 21, 2017 12:10 PM
To: Douglas C Fladseth
Cc: Lynetta Goodwin; 'Rebecca Heath'; 'Kelly Mortensen'
Subject: RE: Cynthia Gutierrez v. SRMH...

Regardless of whether you have to serve the doctors, I think we need to file something with the Court to continue the deadlines. I believe the peer review stuff went out yesterday or is going today.

The films are a problem. We went through all 32,000 pages of records and logged each imaging study report. It appears, for some unknown reason, we were never provided with any films after 2014. I have no idea why. I am contacting the hospital now to find out why and get copies as quickly as possible.

From: Douglas C Fladseth [mailto:fladseth@aol.com]
Sent: Friday, April 21, 2017 12:06 PM
To: Brett Schoel <bschoel@ljdfa.com>
Cc: Lynetta Goodwin <lgoodwin@ljdfa.com>; 'Rebecca Heath' <rebecca@medicalmalpracticegroup.com>; 'Douglas C Fladseth' <fladseth@aol.com>; 'Kelly Mortensen' <dcfsecretary1@gmail.com>
Subject: RE: Cynthia Gutierrez v. SRMH...

Brett we have tried to see who Jim is able to answer for. I have just again asked him if he will accept service for the two ER doctors. He has sent me redacted copies indicating they have a contract with Chase Dennis Emergency Group stating that they are independent contractors. He also has said that Team Health should not be brought in despite what the doctor said about being employed by them in his recent depo.

So if he does not accept service we will have them served starting next week.

You are getting us all the peer review materials and films we have been asking for right away right ?

Thanks, Doug.

From: Brett Schoel [<mailto:bschoel@ljdfa.com>]

Sent: Friday, April 21, 2017 11:32 AM

To: 'fladseth@aol.com'

Cc: Lynetta Goodwin; Rebecca Heath

Subject: Gutierrez

Doug,

The discovery cutoff in this case is May 31. I saw your email to Jim about bringing in the ER docs. I will stipulate to continuing the trial date and discovery deadlines and I think we need to file something with the court immediately. Otherwise, I need to get your client's deposition back on calendar.

Please let me know what you want to do.

Brett Schoel

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